

EXHIBIT G

CONFIDENTIAL



Transcript of **Andrea Sferes**

Tuesday, April 19, 2022

National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.

www.trustpoint.one
www.alderonreporting.com
800.FOR.DEPO (800.367.3376)
Scheduling@Trustpoint.One

Reference Number: 115542

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----
4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and
ANDREA SFERES,

7 Plaintiffs,

8 -and-
9

10 People of the STATE OF NEW YORK, by its Attorney
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE
STATE OF NEW YORK

12 -vs-

13 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,
14 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,
ROBERT MAHANIAN and JOHN and JANE DOES 1-10

15 Defendants.
16 -----
17

18 Deposition of ANDREA SFERES taken via Zoom on
19 Tuesday, April 19, 2022 at 10:00 a.m., before
20 Deirdre Smith, a stenographer and notary public
21 within and for the State of New York.
22
23

24 CONFIDENTIAL
25

1 A P P E A R A N C E S

2

3 ORRICK HERRINGTON & SUTCLIFFE, LLP

4 51 West 52nd Street

5 New York, NY 10019-6142

6 Appearing on behalf of the Plaintiff

7 Phone: (617) 880-1800

8 Email: aaron.gold@orrick.com

9 franklin.monsour@orrick.com

10 rlind@orrick.com

11 BY: AARON GOLD, ESQ.

12 FRANKLIN MONSOUR, ESQ.

13 RYAN LIND, ESQ.

14

15

16 GERSTMAN SCHWARTZ LLP

17 Appearing on behalf of the Defendant

18 60 E. 42nd Street, Suite 4700 Office 21

19 New York, NY 10165

20 Phone: (212) 227-7070

21 Email: nepstein@gerstmanschwartz.com

22 BY: NICOLE EPSTEIN, ESQ.

23

24

25

1 A P P E A R A N C E S

2

3 LAWYERS COMMITTEE FOR CIVIL RIGHTS UNDER LAW

4 Appearing on behalf of Plaintiff

5 1500 K Street NW

6 Suite 900

7 Washington, DC 20005

8 BY: MARC EPSTEIN

9 ADONNE WASHINGTON

10 DAVID BRODY

11

12

13 STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL

14 Appearing on behalf of Plaintiff

15 28 Liberty Street

16 Floor 18, New York, NY 10005-1495

17 Phone: (212) 416-6046

18 BY: COLLEEN FERITY

19

20

21

22

23

24

25

1 MR. EPSTEIN: Objection to form.

2 A. Yeah, can you just repeat?

3 Q. So, when I'm referring to independent
4 research, like for example, a Google search. Did
5 you ever perform any Google searches to verify if
6 the, if the allegation about the police department
7 using the voting record to track down outstanding
8 warrants; did you perform any Google search into
9 that?

10 A. No.

11 Q. Did you perform any Google search into
12 whether credit card companies can use information
13 from the voting record to track down or collect
14 outstanding debt?

15 A. No.

16 Q. At the time that you received the robocall
17 did you believe that African Americans wouldn't be
18 able to recognize that the statements were allegedly
19 false?

20 MR. EPSTEIN: Objection.

21 A. No.

22 Q. So, do you believe that African Americans
23 would have been able to tell that the message was
24 false?

25 MR. EPSTEIN: Objection.